

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$10,000.00 IN UNITED STATES
CURRENCY,

Defendant.

Civil Action No.

VERIFIED COMPLAINT FOR FORFEITURE

AND NOW comes the United States of America, by and through its counsel Stephen R. Kaufman, Acting United States Attorney for the Western District of Pennsylvania, and David Lew, Assistant United States Attorney for the Western District, and respectfully represents as follows:

1. This is a civil action *in rem* for forfeiture to the United States of \$10,000.00 in United States currency (the “Defendant Currency”) pursuant to 21 U.S.C. § 881(a)(6).

2. Jurisdiction is predicated upon 28 U.S.C. §§ 1345 and 1355. Venue is proper under 28 U.S.C. §§ 1395 and 1355.

3. On January 19, 2021, United States Postal Inspection Service (“USPIS”) Inspectors interdicted a suspicious Priority Express Mail parcel bearing number EJ305635105US (the “Subject Parcel”) at the U.S. Postal Service Processing and Distribution Center in Pittsburgh, Pennsylvania.

4. Inspectors observed that the Subject Parcel possessed characteristics consistent with the shipment of illegal narcotics and/or proceeds.

5. The Subject Parcel was addressed to “Ahmed Fabre” at “1221 N Vineyard Ave., Ontario, CA 91764, Apt. #100,” with a return address of “2800 Lori Dr, New Ken, PA, 15068,” with no sender name.

6. California is a known source state for illegal narcotics being sent to the Western District of Pennsylvania and a state where proceeds of narcotics trafficking are commonly sent to.

7. The lack of a sender name on the Subject Parcel is consistent with the practice of narcotics traffickers who seek to avoid identification by law enforcement.

8. Inspectors conducted a search of law enforcement databases, which revealed that “Ahmed Fabre” was not associated with the Subject Parcel’s delivery address.

9. On January 19, 2021, the Subject Parcel was subjected to examination by a trained narcotics detection canine, which alerted on the Subject Parcel, indicating the odor of controlled substances.

10. On January 20, 2021, USPIS Inspectors obtained a federal search warrant for the Subject Parcel. Upon opening the Subject Parcel, Inspectors found an Apple computer box wrapped in clear plastic. The box contained a computer. Hidden beneath the computer, Inspectors found the Defendant Currency vacuum sealed in plastic. The manner in which the Defendant Currency was packaged was consistent with the practice of narcotics traffickers who attempt to minimize drug odor.

11. The Defendant Currency consisted primarily of \$20 bills, a denomination commonly used by narcotics traffickers.

12. The Subject Parcel contained no notes, receipts, letters, or instructions, which is consistent with the sending of narcotics-trafficking proceeds rather than legitimate funds.

13. Based on the above investigation, USPIS Inspectors determined that the Defendant Currency was intended to be furnished in exchange for a controlled substance and/or represented proceeds of unlawful drug transactions. The Defendant Currency was therefore seized pursuant to 21 U.S.C. § 881(a)(6).

14. On or around February 2, 2021, USPIS personnel were contacted by an individual identifying himself as Dalton Smith inquiring about the Subject Parcel. During a telephone call with Inspectors, Smith stated that the Subject Parcel contained an Apple computer that had been sent to him by Fabre and that he had sent the computer back to Fabre because he did not want it. Smith further stated that the Subject Parcel contained only a computer and nothing else.

15. USPIS Inspectors then contacted Fabre by telephone using a number provided by Smith. Fabre told Inspectors that he had sent the Subject Parcel to Smith and that it contained an Apple MacBook. He stated that Smith had sent the computer back to him because it did not work. Fabre was asked by Inspectors if there was anything else inside the Subject Parcel, and he responded that there was nothing else.

16. Inspectors informed Fabre that a federal search warrant had been executed on the Subject Parcel and that in addition to a computer, the Subject Parcel contained \$10,000.00 in U.S. Currency that was vacuum sealed in the false bottom of the computer box. Fabre responded that he knew nothing about the money and was just expecting a computer.

17. Statements from Smith and Fabre denying any knowledge of the Subject Currency further demonstrated to Inspectors that the currency was involved in illegal narcotics trafficking.

18. Investigation further revealed that Smith had been previously convicted of drug-related offenses.

19. Following the seizure, USPIS instituted administrative forfeiture proceedings against the Defendant Currency. Fabre filed a claim for the Defendant Currency in the administrative forfeiture proceedings despite previously denying any knowledge of the currency. Fabre asserted in his claim that the funds were being returned to him as repayment for a loan. As a result of an administrative claim being filed, the United States has instituted this civil forfeiture action against the Defendant Currency.

20. Based on the foregoing, the Defendant Currency is forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6) because it was furnished or intended to be furnished in exchange for a controlled substance and/or constitutes proceeds traceable to an exchange for a controlled substance and/or was intended to be used to facilitate any violation of the Controlled Substances Act.

WHEREFORE, the United States respectfully requests that process of warrant *in rem* issue for the arrest of the Defendant Currency; that Judgment of Forfeiture be entered in favor of the United States for the Defendant Currency; and that the United States be granted such relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

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VERIFICATION

I am an Inspector with the United States Postal Inspection Service and the case agent assigned to this case.

I have read the contents of the foregoing complaint for forfeiture, and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on this 17th day of May, 2021.



Brian Dodd, Inspector
United States Postal Inspection Service